

On behalf of Texas Public Radio, licensee of KPAC and KSTX in San Antonio, TX and KTXI in Ingram, TX, I am writing to respond to the Commission's Further Notice of Proposed Rulemaking in regard to MM Docket 99-325.

TPR strongly supports the FCC's intent to support a flexible and largely market-driven DAB policy. We encourage the Commission to promote policies that provide broadcasters and receiver manufacturers with maximum flexibility to fully realize the benefits of HD Radio technology.

We encourage Digital Audio Multicasting. The offering of new program options on Secondary Audio Channels is one of the keys to creating consumer demand for digital receivers. Moreover, the implementation of Secondary Audio Channels is highly desirable as it would allow public radio broadcasters to serve additional audiences with program services not presently available to them. This is of particular interest to Texas Public Radio since there is a very large Spanish-speaking population in San Antonio that would benefit from a public-radio-type news and information program service delivered in Spanish.

We also endorse allowing licensees to lease unused audio capacity to other parties if they do not intend to use the capacity themselves. This will help promote program diversity and provide valuable new revenue for public radio stations to support their main channel program services.

We encourage adoption of a flexible policy permitting licensees to produce and distribute any and all kinds of datacasting services or lease that capacity to other parties.

We encourage allowing subscription services on Secondary Audio Channels as a means of funding new SAC-delivered program services.

We encourage flexibility on antenna options, allowing licensees to select the systems most appropriate to their specific circumstances.

Finally, anticipating the possibility of activating translators in the future to serve rural communities in South and West Texas, we encourage the implementation of dual-output DAB translators so that dual services can be broadcast via one translator.

Texas Public Radio appreciates the opportunity to offer its views on the Commission's proposals and encourages expeditious completion of IBOC rules with maximum flexibility for licensees as the guiding principle.

Respectfully submitted;

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